



OFFICE OF
CHIEF COUNSEL

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

MEMORANDUM FOR: Harry J Hicks III
Associate Chief Counsel (International)

FROM: Matthew W. Frank, APA Program Director

DATE: October 31, 2003

SUBJECT: APA Quarterly Report for FY 2003,
Fourth Quarter Ending 9/30/03

The following are the APA Program's results for the fourth quarter of FY 2003 ("Q4").

APAs Completed

The APA Program completed 13 APA matters in Q4. That number consists of 6 bilateral APAs (2 renewals) and seven (7) unilateral APAs (including 5 renewals and 1 unilateral amendment).

Negotiating Position Papers

The APA Program completed 1 bilateral negotiating position paper in Q4.

Annual Reports

The APA Program reviewed and closed 56 annual reports in Q4.

New Matters

The APA Program received 32 new APA matters in Q4, consisting of 16 bilateral and 16 unilateral matters. Five of the bilateral and 7 of the unilateral matters involve renewals.

APA Inventory

The APA Program has an ending inventory of 218 open matters.¹ This consists of 162 bilateral and 56 unilateral matters.²

Attached for your information is the APA issuance report and open inventory reports as of September 30, 2003. Please contact me at (202) 435-5222 if any additional information is required.

Respectfully submitted,

Matthew W. Frank
APA Program Director

Attachments

cc: LMSB Commissioner
Director, International
National Director of Appeals
LMSB Division Counsel

1. This equals beginning Q4 inventory of 221 matters, plus 32 receipts, less 13 closures {199 + 32 - 13 = 218}.

2. The 218 open matters include 18 pending dollar filings (9 bilateral and 9 unilateral):
Thus

\$ The APA Program has an inventory of 200 active cases, i.e., 218 open matters less 18 pending dollar filings.

\$ The 218 active cases consist of 153 bilateral cases (162 total bilateral matters less 9 pending bilateral dollar filings) and 47 unilateral cases (56 total unilateral matters less 9 pending dollar filings).

\$ The APA Program has forwarded 94 of the 153 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 105 cases, consisting of 58 bilateral (153 active bilateral cases less 95 forwarded to Competent Authority) and 47 active unilateral cases.